

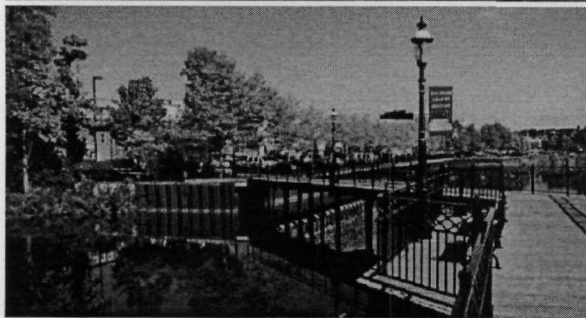


Proposed Peer Review Process—Ecological Data

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site

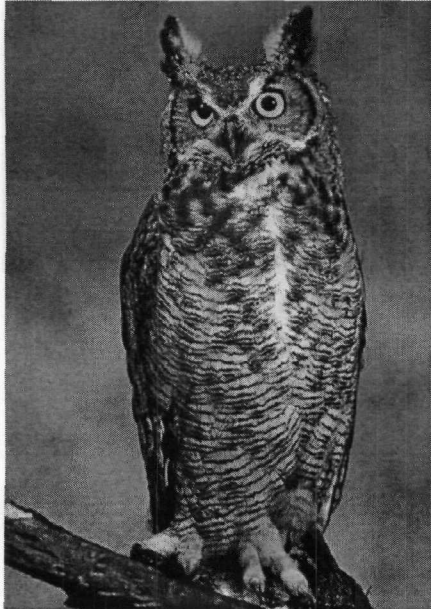
May 3, 2007

Chicago, IL



Purpose of Peer Review

- Obtain an independent review and opinion regarding the suitability, for risk management decision-making purposes, of the MSU site-specific ecological risk studies conducted by Michigan State University (MSU Studies)



Peer Review Process

- Based on USEPA Science Policy Council's January 2006 *Peer Review Handbook* (EPA 100-B-06-002)
- Review will focus on:
 - *Final (Revised) Baseline Ecological Risk Assessment*
 - *Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site* (Site-Wide Baseline ERA; CDM 2003)
 - Results of MSU studies (2000-2004) of floodplain soil receptors
- Facilitated by an independent Peer Review Manager

Background

- KRSG sponsored exposure and effects studies by Michigan State University to supplement the evaluations presented in the Site-Wide Baseline ERA (CDM, 2003).
 - Focused on both aquatic and floodplain receptors
- The SRI/FS AOC provides for a peer review of these data

Peer Review Manager: Qualifications/Position Description

- Independent scientist with extensive peer review experience
 - Consult with the Chairperson of the Ecological Processes and Effects Committee (EPEC) of USEPA's Science Advisory Board to identify candidates
- Demonstrated experience working in a multi-stakeholder process and conducting scientific peer reviews
- Roles and Responsibilities:
 - Assist in selection of panel members
 - Present Charge to Panel
 - Serve as point of contact during independent review
 - Facilitate panel discussions
 - Compile Draft Consensus Report

Proposed Process for Selecting Peer Review Manager

KRSG and USEPA Propose List
of Potential Candidates

USEPA and KRSG Review and
Discuss List

Identify Preferred Candidate
through Consensus

Confirm Availability of Preferred
Candidate

Establish Contract with Peer
Review Manager

Information to be Evaluated by Panel

- Site-Wide Baseline ERA (CDM, 2003) and associated Site-specific data
- MSU studies of floodplain soils led by Dr. John Giesy in former Trowbridge Impoundment and reference area
 - Productivity assessment of three passerine species, and great horned owl
 - Measures of dietary composition for birds
 - Measures of prey tissue PCB concentrations for birds
 - Measures of soil to plant PCB bioaccumulation
 - Site-specific habitat and species abundance evaluations

Composition of the Peer Review Panel

- Recognized expertise in CERCLA ERA and Risk Management process and one or more of the following:
 - PCB partitioning and toxicology
 - ERAs for floodplain soils
 - Relevant receptors (e.g., birds and small mammals)
 - Design and implementation of studies evaluating site-specific risks to local populations



Composition of the Peer Review Panel



- Preference will be given to candidates with
 - Peer review experience
 - No prior experience on the Kalamazoo River
- Panel members will be selected by consensus of USEPA and the KRSG

Proposed Process for Selecting Peer Review Panel

KRSG and USEPA Compile List for Consideration by Peer Review Manager

Peer Review Manager Reviews Expertise & Availability of Candidates

Peer Review Manager Presents List of Qualified Candidates

USEPA & KRSG Select Panel from List through Consensus Process

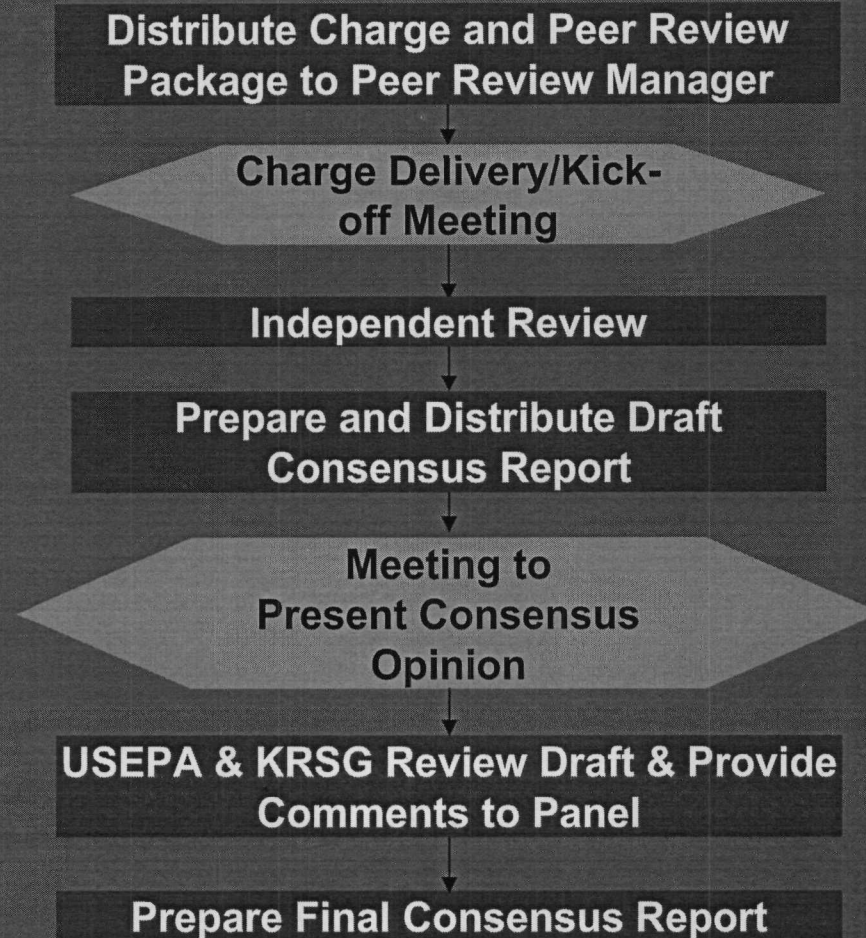
If no consensus, USEPA & KRSG each select 2 panel members from original or expanded list who then choose 5th member from list

Contract Final Panel

Development of Peer Review Charge SOW and Charge

- KRSG to submit draft Peer Review SOW and Charge to USEPA by June 21, 2007
- SOW and Charge will be finalized based on comments from USEPA
 - USEPA will incorporate comments from MDEQ and Natural Resource Trustees
- Peer Review Package will be developed that includes SOW and Charge, Final Site-wide BERA (CDM, 2003), summary of MSU studies, and appropriate supporting information for MSU studies
- Peer Review Package will be delivered to the Peer Review Manager for distribution to the Panel approximately two weeks before the Charge Delivery Meeting

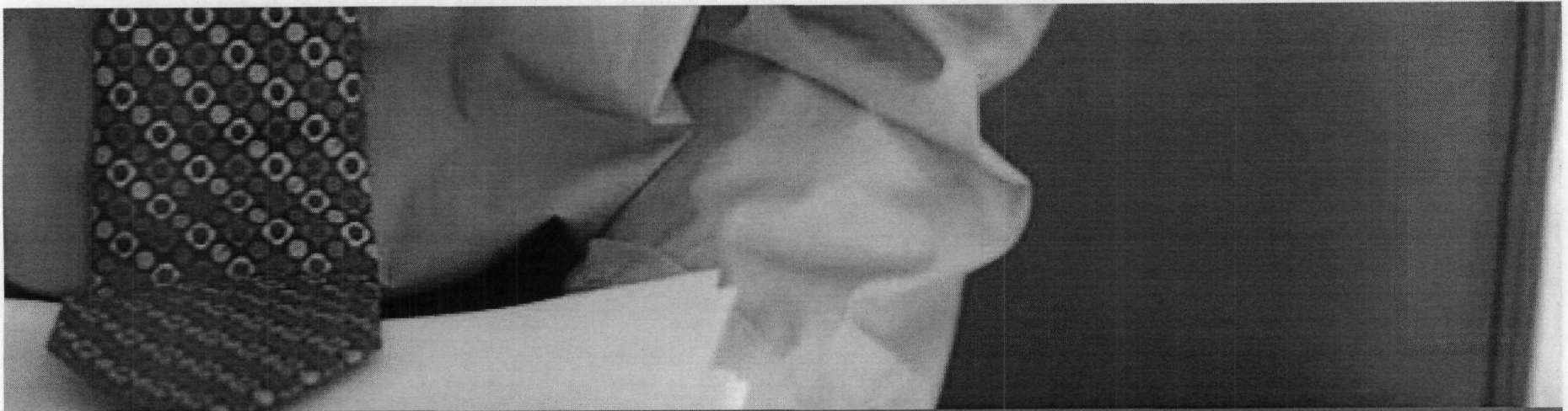
Proposed Peer Review Process



Charge Delivery/Kick-Off Meeting

- Facilitated by Peer Review Manager
- Participants:
 - All Panel members
 - Representatives from KRSG and USEPA
 - Dr. John Giesy (professor emeritus at MSU, and professor and Canada research chair at the University of Saskatchewan)
 - MDEQ and the Natural Resource Trustees also invited
- Charge delivery and overview: Peer Review Manager
- Summary of MSU studies: Dr. Giesy
- Opportunity for Panel members to ask questions and seek clarifications regarding the charge and data/information included in the package provided prior to the meeting

Independent Review

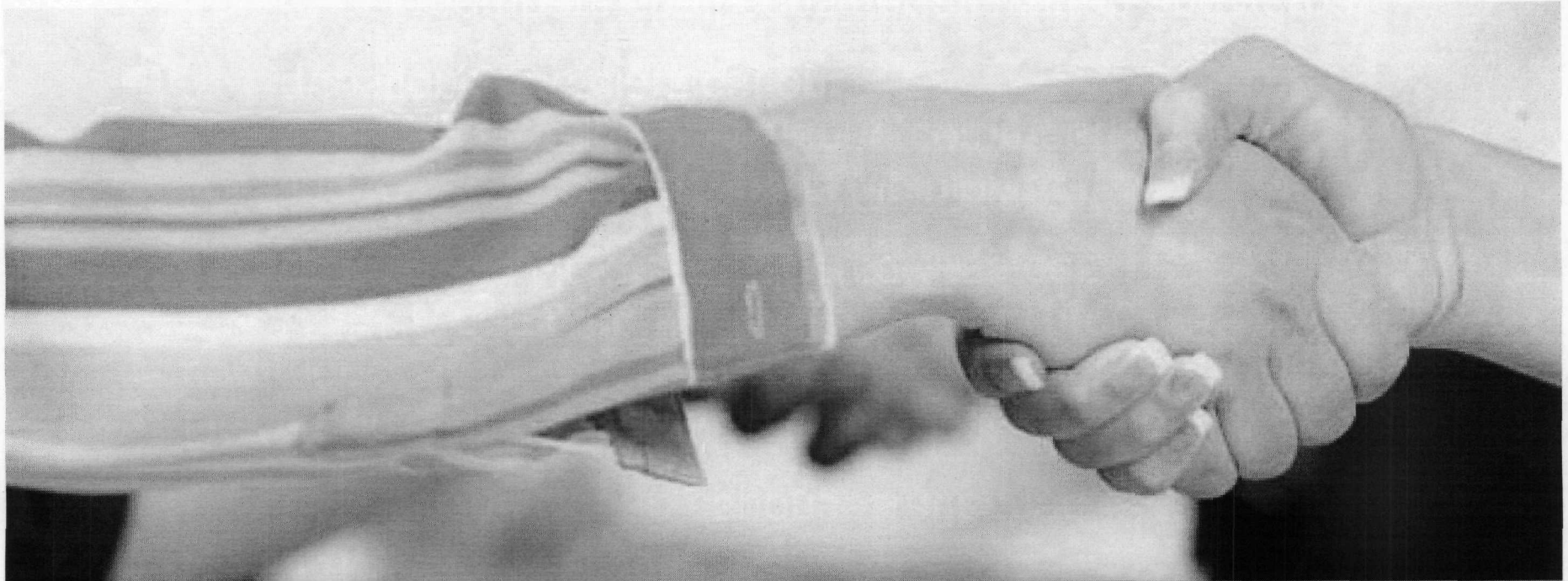


- Panel will have 60 days to review information and prepare individual written responses to the charge
- Peer Review Manager will be sole point of contact for all communications with the panel
- Panel members will have no contact with other panel members, the KRSG, USEPA, MDEQ, or the Natural Resource Trustees

Consensus Report Preparation

- Consensus and dissenting opinions compiled into draft report by Peer Review Manager
 - Original individual responses attached to report
- Draft report submitted to KRSG and USEPA for review and comment
 - USEPA comments will incorporate comments from MDEQ and Natural Resource Trustees
- Meeting to Present Consensus Opinion
 - One-day meeting held during comment period for questions and clarifications
- The Panel members shall consider all written and verbal comments received from KRSG and USEPA when developing the Final Consensus Report

Final Consensus Report Contents



- Final consensus opinion and any dissenting or minority opinions
- Original individual responses to charge attached
- Minutes from Meeting to Present Consensus Opinion

Summary of Proposed Schedule

Process Step	Estimated Timeframe	Estimated Dates
Submit draft SOW and charge	120 Days from effective date of SRI/FS AOC	June 21, 2007
Agency Review and comment	60 days after draft SOW and charge submitted	August 20, 2007
Finalize Peer Review SOW and Charge	30 days after comments received	September 19, 2007
Selection of the Peer Review Manager	30 days after peer review charge is finalized	October 19, 2007
Selection of the Panel members	60 days after the selection of the Peer Review Manager	December 18, 2007
Preparation of Charge Delivery Package and Distribution to the Panel	Within one week of selecting panel members	Late December, 2007
Presentation of the Charge to the Panel	Two weeks after selection of the Panel and distribution of peer review materials	Mid-January, 2008
Panel members conduct independent review and prepare consensus and minority opinions	Approximately 90 days after the presentation of the Charge	March 7, 2008
Delivery of Draft Consensus Report	30 days after the Peer Review Manager receives all the consensus and minority opinions from each topic/question lead	April 7, 2008
Meeting to Discuss Draft Consensus Report	30 days after distribution of draft Consensus Report	May 5, 2008
USEPA and KRSG Comments on Draft Consensus Report to Peer Review Manager	60 days after distribution of draft Consensus Report	July 4, 2008
Delivery of Final Consensus Report and Release of Panel	Approximately 45 days after comments received on draft	August 18, 2008

Summary of Proposed Charge

- Review the Site-Wide Baseline ERA (CDM, 2003) and the summary of the KRSG-sponsored studies conducted by MSU and evaluate:
 - the scientific merit and the consistency of the methods employed
 - the relevance of the MSU studies for evaluating baseline ecological risk in each Area
 - the suitability of the MSU studies for use in risk management decisions

Administrative Issues

- Funding and contract for Peer Review manager
- Funding and contract for Panel Members
- Administrative support for Peer Review Manager